

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NORTH CAROLINA
WESTERN DIVISION**

NOKIA TECHNOLOGIES OY,

Plaintiff,

v.

**LENOVO (SHANGHAI) ELECTRONICS
TECHNOLOGY CO. LTD., LENOVO
GROUP, LTD., LENOVO BEIJING, LTD.,
LENOVO PC HK LIMITED, AND
LENOVO (UNITED STATES), INC.,**

Defendants.

CIVIL ACTION NO.

5:19-CV-0427-BO

**DECLARATION OF WARREN LIPSCHITZ IN SUPPORT OF PLAINTIFF NOKIA
TECHNOLOGIES OY'S RESPONSE TO DEFENDANT LENOVO (UNITED STATES)
INC.'S MOTION TO LIMIT THE NUMBER OF ASSERTED CLAIMS**

I, Warren Lipschitz, do state and declare as follows:

I am an attorney at the law firm of McKool Smith PC ("McKool Smith"), counsel for Plaintiffs Nokia Technologies Oy. I make this declaration in support of Nokia's Response to Lenovo's Motion to Limit the Number of Asserted Claims. Unless otherwise stated, the matters contained in this declaration are of my own personal knowledge and, if called as a witness, I could and would testify competently to the matters set forth herein.

1. Attached hereto as Exhibit 1 is a true and correct copy of email correspondence between counsel for Nokia and counsel for Lenovo, dated April 28, 2020 - June 29, 2020.
2. Attached hereto as Exhibit 2 is a true and correct copy of the letter from Alexandra Easley to Bradley Baglien, dated June 9, 2020.
3. Attached hereto as Exhibit 3 is a true and correct copy of the notice of third-

party subpoena to Qualcomm, dated April 27, 2020.

4. Attached hereto as Exhibit 4 is a true and correct copy of the comparison of select asserted claims.

5. Attached hereto as Exhibit 5 is a true and correct copy of the email from Warren Lipschitz to Harry Hanson, dated June 17, 2020.

6. Attached hereto as Exhibit 6 is a true and correct copy of email correspondence between counsel for Nokia and counsel for Lenovo, dated July 3, 2020 - July 28, 2020.

7. Attached hereto as Exhibit 7 is a true and correct copy of Lenovo Technology (UK), Ltd. and Motorola Mobility UK Ltd.'s Defence and Counterclaim filed in the High Court of Justice Business and Property Courts of England and Wales Intellectual Property List (Chancery Division) Patents Court, in *IPCom GMBH & Co. KG and Lenovo Technology (UK) Limited, et al.*, dated September 23, 2019.

I declare under penalty of perjury that the foregoing is true and correct and this declaration was executed on July 29, 2020, in Dallas, Texas.

/s/ Warren Lipschitz

Warren Lipschitz